



# E-Rate Central

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Before the  
Federal Communications Commission  
Washington, D.C. 20554

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In the Matter of

Implementation of the Affordable  
Connectivity Program

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WC Docket No. 21-450

## **TWO WORDS — ONE COMMA**

### **REPLY COMMENTS ON THE IMPLEMENTATION OF THE AFFORDABLE CONNECTIVITY PROGRAM (WC Docket 21-450; DA 21-1453)**

E-Rate Central submits these Reply Comments in response to Public Notice DA 21-1453 seeking comment on the implementation of the Affordable Connectivity Program (“ACP”) to be established as a provision of the Infrastructure Investment and Jobs Act (“Infrastructure Act”) in part to modify and extend the Emergency Broadband Benefit (“EBB”) Program provision of the Consolidated Appropriations Act, 2021.

The initial Comments in this docket filed by SHLB and E-Rate Central made a strong case for explicitly including homeless shelters in the list of multiple dwelling units (Para. 57), clearly making them eligible to receive ACP benefits as a bulk broadband service. Similar recommendations on homeless shelters were made in the Comments filed by the [California](#)

[Emerging Technology Fund](#) (p. 23) and the [City of Boston et al](#) (p. 16). Numerous other commentors supported bulk purchase arrangements broadly designed to provide ACP coverage for HUD or other low-income public housing authorities.

E-Rate Central recognizes that somewhat more detailed rules or procedures may be needed to fully address ACP benefits for homeless shelters and that such details may be beyond the scope of the initial Commission Order. Details, for example, might include:

- Broadly defining “homeless shelters” to include related facilities such as domestic violence shelters;
- Accepting a presumption of eligibility of homeless shelter residents instead of having to validate, and continually update, the income eligibility of transient families;
- Basing ongoing internet service discounts on shelter capacity and occupancy rates rather than the tracking of individual households;
- Applying connected device discounts to a pool of useable devices rather than to devices for specific individuals or families; and
- Permitting the bulk purchaser of ACP-eligible services to be either the shelter manager or a local school district seeking internet coverage for its students.

To facilitate the Commission’s early release of the basic ACP Order, E-Rate Central recommends that the consideration of any necessary procedural details for homeless shelter eligibility and ACP implementation be delegated to the Wireless Competition Bureau (“WCB”).

What is critically important is that the initial ACP Order recognize the eligibility of homeless shelters. E-Rate Central believes this can be done by adding **two words and one comma** to the multiple dwelling unit section of the ACP Order.


To paraphrase language in the EBB rules, the ACP Order should affirm the eligibility of households that “live at a single address, such as senior and student living, mobile home parks, apartment buildings, **homeless shelters**, and federal units, that receive service as part of a bulk

billing arrangement where the households are not directly billed for services by their internet service provider,” should be permitted to participate in the ACP Program.

**Conclusion.**

E-Rate Central encourages the Commission to include two specific words (and a comma) — **“homeless shelters,”** — to the list of ACP-eligible multiple dwelling units.

Respectfully Submitted by:



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